UNITED STATES DISTRICT COURT DISTRICT OF PUERTO RICO

In re:

The Financial Oversight and Management Board for Puerto Rico,

as representative of

The Commonwealth of Puerto Rico, The Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and the Puerto Rico Public Buildings Authority,

Debtors

PROMESA Title III

No. 17 BK 3283 (LTS)

(Jointly Administered)

PFZ'S OBJECTION TO THIRD REVISED PROPOSED CONFIRMATION ORDER

To the Honorable Court:

Comes now PFZ Properties, Inc. (hereinafter, PFZ), a creditor of the Commonwealth of Puerto Rico (hereinafter, the Debtor or the Commonwealth), by and through its undersigned counsel, and respectfully alleges and prays:

1. PFZ objects as follows to the November 12, 2021 Proposed
Order and Judgment Confirming Modified Eight Amended Title III
Joint Plan of Adjustment of the Commonwealth of Puerto Rico et al.

(Docket #19188, Exhibit A). This objection is made pursuant to the Court's November 12, 2021 Amended Order Directing Supplemental Briefing and Oral Argument on Issues Pertaining to the Confirmation Hearing (Docket #19179)

- 2. PFZ incorporates by reference and reasserts with this filing, as to the Third Revised Confirmation Order, all of its objections to earlier versions of the Disclosure Statement, the Plan as reflected in PFZ's filings (Dockets #9223, #16969, #18418 and #19088). PFZ's objection to the confirmation of the 8th Amended Plan of Adjustment for the Commonwealth stands as expressed in its filings, with full reservations of rights.
- 3. PFZ reserves all rights in connection with this filing, including the right to file additional briefings, deemed warranted once the U. S. Department of Justice files its position with regards to PFZ's pending constitutional challenge (Docket # 18486), or to supplement or modify it in light of further modifications to the proposed plan of Adjustment or the confirmation order.

WHEREFORE, PFZ Properties Inc. respectfully prays that the Honorable Court note PFZ's position, full reservation of rights.

CERTIFICATE OF SERVICE

I hereby certify that on this $15^{\rm th}$ day of November 2021, I electronically filed the foregoing motion with the Clerk of the

Court using the EM/ECF system, which will send a notification to all attorneys of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 15th day of November 2021.

/s/ DAVID CARRION BARALT USDC PR 207214 Attorney for PFZ Properties P.O. Box 364463 San Juan, P.R. 00936-4463 Tel. (787) 758-5050 E-mail: davidcarrionb@aol.com

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